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September 13, 2013

ELECTRONICALLY FILED

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street, Room 7W
Trenton, NJ 08608

Re: *In re New Jersey Tax Sales Certificates Antitrust Litig.*
Master Docket No.: 3:12-CV-01893-MAS-TJB

Dear Judge Shipp:

Enclosed for Your Honor is the Settlement Agreement entered into on September 10, 2013 between plaintiff class representatives and defendants M.D. Sass Investor Services, Inc., M.D. Sass Tax Lien Management, LLC, M.D. Sass Municipal Finance Partners- I, L.P., M.D. Sass Municipal Finance Partners- II, L.P., M.D. Sass Municipal Finance Partners- III, LLC, M.D. Sass Municipal Finance Partners- IV, LLC, M.D. Sass Municipal Finance Partners- V, LLC, M.D. Sass Municipal Finance Partners- VI, LLC, Vinaya K. Jessani, and Stephen E. Hruby (collectively “the Sass Defendants”). The parties will file for preliminary approval of this settlement at a later date.

Pursuant to paragraph 30 of the settlement agreement with the Sass Defendants, plaintiffs and the Sass Defendants jointly request that the Court hold in abeyance the M.D. Sass Defendants’ Motion to Dismiss [Dkt. No. 178], Defendant Vinaya K. Jessani’s Motion to Dismiss [Dkt. No. 177], and the Defendants’ Joint Motion to Dismiss as it relates to the Sass Defendants [Dkt. No. 174] (the “Motions”). Pursuant to the same paragraph of the settlement agreement, within seven days following the entry of an order preliminarily approving this Settlement Agreement, the Sass Defendants shall formally withdraw the Motions (or, in the case of the Defendants’ Joint Motion to Dismiss, shall withdraw their participation in that motion), without prejudice to renewing the Motions in the event that Final Approval of the Settlement is denied or the Settlement Agreement is rescinded.

Thank you very much for your consideration.

Respectfully,

/s/ Bruce D. Greenberg
Bruce D. Greenberg

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Enclosure
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